

**CITY OF REDDING COMMENTS ON THE  
CALFED BAY-DELTA PROGRAMMATIC ENVIRONMENTAL IMPACT  
STATEMENT/ENVIRONMENTAL IMPACT REPORT**

**GENERAL COMMENTS:**

(1) The City of Redding ("City") believes the abbreviated review period for CALFED's Programmatic Environmental Impact Statement/Environmental Impact Report ("EIS/EIR") is inappropriate. CALFED's program is the most ambitious water project in the country. As stated in the Phase II Interim Report, "The unprecedented scope of the Program cannot be overstated." It is unreasonable to expect the public to digest the ramifications of the proposal in such a short review period. Trying to rush this Program through the public review process is counter-productive to the Program's long term goals and success.

(2) The EIS/EIR provides a very general analysis of a range of alternatives that address identified problems in the Bay-Delta "system". The stated purpose of the EIS/EIR is to support the selection of a preferred program alternative that will include the seven identified elements. However, the analysis provided is not sufficient to accomplish this purpose. First, the EIS/EIR should analyze the range of alternatives with an overlay of CALFED's underlying "solution principles." The Phase II Interim Report ("Interim Report") states that "a more thorough analysis and discussion must occur before the solution principles can be used to distinguish one alternative from another." (Interim Report at 132.) The time for that "analysis and discussion" is now, at the programmatic stage of review. The public should be informed of whether the various elements are consistent with the principles and to what extent. Leaving that analysis out of the EIS/EIR is a fundamental flaw in the CALFED process. Second, Section 1.3.2 of the EIS/EIR states that some of the "actions" could require, among other things, new legislation, changes in water project operations, and government purchase of land and water rights. The document fails to detail or explain the legislation that would be needed. Also, any action that would result in government purchase of land and water rights, either voluntarily or by condemnation, must be disclosed before an alternative is selected. The public must be fully informed of the consequences of a particular decision before the decision is made.

(3) For purposes of a programmatic analysis, CALFED's programs should include specific objectives related to each one. Rather than state that a program will improve habitat or water quality or reduce impacts, the document should state specific goals and objectives that would show when a program is achieving "success." Drafting clearer program goals and objectives will give the public a better idea of what CALFED is proposing and will create an opportunity to comment on a more substantive basis.

(4) CALFED is engaging in a confusing process that ostensibly incorporates both CEQA/NEPA requirements and the desire to build consensus and broad support for the Program. The problem is that a great deal of public input is treated as a comment on the CEQA document and does not receive a direct response from CALFED representatives. This was the experience of many people attending a recent public meeting in Redding that was presented by CALFED representatives. Where is the opportunity for the public to participate outside the CEQA context?

(5) The importance and environmental impacts of each of the alternatives should be evaluated on a subregion-specific basis. As written, the EIS/EIR makes broad generalizations regarding benefits and impacts of particular actions that could be taken in the Sacramento River Region, the San Joaquin River Region, the Bay-Delta, etc. This does not represent the true range of possible Program impacts. For example, Program impacts in Shasta County could differ vastly from the impacts in Sacramento County. However, both are lumped together in the analysis as the "Sacramento River Region." This generalization fails to account for the more localized impacts that could occur, and obscures the effectiveness of mitigation measures. For example, the EIS/EIR might conclude that an impact on reservoir recreation would be offset by increased river recreation attributable to increased flows. However, the adverse impact would be in Shasta County and the benefit might occur in the Delta region or in areas downstream from Shasta County. Failure to account for different impacts within a "region" results in an inadequate and incomplete analysis.

(6) The CALFED Program focuses, in part, on water quality, quantity and reliability issues for diverters from the Bay-Delta, including SWP and CVP contractors. These issues are primarily economic, in that improving water quality, quantity and reliability reduce short and long-term water costs to users south of the Delta. Areas in the north state, such as Redding and Shasta County, are also interested in economic issues related to water. In Shasta County, water supply and reliability are important concerns. However, the north state is also interested in program impacts on local recreation opportunities. The analysis of potential impacts on recreation in the EIS/EIR is far too general and appears to underestimate those impacts. A 1994 study commissioned by the U.S. Forest Service, Shasta County and other interested public agencies entitled "Economic Assessment of Alternative Water-level Management for Shasta and Trinity Lakes" showed that Shasta Lake recreational activities are primarily a function of perceived recreational quality, with a direct relationship between visitor days and lake levels. In fact, reduced reservoir levels during the peak recreational months are directly related to economic losses of approximately \$25 million annually from water dependent activities on Shasta Lake alone. The EIS/EIR should include a more complete analysis of Program-related impacts on recreation. Certainly, the City seeks assurances from CALFED that recreation impacts and associated economic impacts are limited under whichever program CALFED pursues.

(7) As written, the EIS/EIR does not distinguish CALFED benefits and impacts from those attributable to the CVPIA, but instead aggregates those programs together. The no action alternative should be revised to incorporate CVPIA programs. CALFED's program alternatives should be evaluated on the basis of their benefits and impacts, not in conjunction with those attributable to the CVPIA.

(8) The document references "beneficiaries" throughout, particularly in the context of who will pay for a comprehensive Bay-Delta solution. Who is considered a beneficiary? Would this be anyone who diverts from the Bay-Delta, the Bay-Delta watershed, or everyone in California? The document should describe who the "beneficiaries" are.

(9) The EIS/EIR focuses on how additional water supplies can be diverted from the Delta to the SWP and CVP service areas. The long term needs and concerns of other areas

received little consideration in the analysis. This is consistent with the comments CALFED representatives have heard in public meetings in for various Sacramento Valley and Bay-Delta communities. CALFED should revise its document -and its procedures - to ensure that the concerns of all stakeholders are addressed.

(10) The EIS/EIR and the Phase II Interim Report are inconsistent and confusing when read together. For example, the EIS/EIR discussion of salinity levels attributable to the three alternatives concludes that Alternative 3 would "improve salinity in the central Delta, have small impacts on salinity in the southwest Delta, and increase salinity in the south Delta." The Phase II Report states Alternative 3 would improve conditions in the central Delta over other alternatives, " but would reduce quality (increase salinity) by up to 80% percent in the eastern Delta." This is but one example of where the Phase II Report is inconsistent with the EIS/EIR. The public should not have to read through all of the CALFED documents to determine which is the most reliable or accurate. If new information is available, then a subsequent EIS/EIR should be prepared.

(11) The EIS/EIR should evaluate all the alternatives, including the common elements, based on the CALFED "solution principles". If those principles are to have any meaning, they must be considered and evaluated before a preferred alternative is selected.

**SPECIFIC COMMENTS:**

Passim: The EIS/EIR should include performance standards that will guide site and impact-specific mitigation measures when a more specific program is developed. The mitigation measures proposed for the various program components are too vague, focusing on generalized goals rather than specific performance standards. All sections of the EIS/EIR containing mitigation measures should be modified to include specific performance standards.

Section 2.3.2.1: The EIS/EIR states that CALFED's consideration of additional water storage north and south of the Delta requires additional study and consideration. The Phase II Interim Report affirms this need, stating "much additional study" is required "to determine whether storage projects are environmentally acceptable and/or economically feasible. Under the circumstances, this additional investigation should be completed and disclosed to the public before a preferred alternative is selected.

Section 2.3.2.6: This section is representative of many of the shortcomings in the Programmatic EIS/EIR. CALFED is "addressing water transfers from both a technical and policy perspective." The document does not analyze whether transfers are actually working and whether they could be a successful part of the CALFED program. Such a discussion should be provided before a preferred alternative is selected.

Section 6.1: (1) CALFED's program will have water supply benefits to south of Delta SWP and CVP water contractors. However, the EIS/EIR does not appear to evaluate potential impacts based on increased use in areas upstream of the Delta, as that area builds out over time. The analysis should account for reductions in amounts available for diversion in the Delta as areas to the north increase diversions from the Sacramento River and its

tributaries. (2) The EIS/EIR assumes that water supply changes are considered adverse if they reduce "the amount of water that can be delivered to meet an established demand." (6.1-10.) One of the significant concerns the City has is its ability to meet not only its established demand, but its future demand. As a municipal diverter in the area and watershed of origin, the City has an expectation that water will be available to meet the City's projected long term demand. The EIS/EIR should analyze whether CALFED's program will impact water supply availability in areas north of the Delta, for both existing and future demand. This analysis should distinguish between source counties (where water originates) and areas where water does not originate. Analyzing this potential impact on the broad scale covered in the EIS/EIR (i.e., Sacramento River Region) is not appropriate. (3) In the interest of keeping the CALFED program equitable, CALFED should consider increasing water supply availability north of the Bay-Delta in an amount equal to increased water supplies south of the Bay-Delta made available by the Program.

Section 6.1.4.4: The discussion of waters supply benefits in the San Joaquin River Region states that improved water quality at the south Delta pumping facilities "may reduce the total amount of water needed to achieve a given benefit." What is the basis for this statement? Are the examples given (less blending, fewer losses due to treatment, etc.) actually quantified, or is the statement simple speculation?

Section 6.2.1.2: This section includes a discussion of the "regulatory framework of groundwater management", including a brief discussion of applicable groundwater law. The EIS/EIR should include a similar discussion of water rights law in the section dealing with surface water.

Section 6.2.2.2: Groundwater impact significance criteria should include the increase in cost of replacing surface water supplies with groundwater as a result of a conjunctive use program.

Section 7.1: This section is confusing because it does not include the principles explained in the Phase II Interim Report regarding system variability and the time value of water. Absent consideration of those principles, the discussion in the EIS/EIR is virtually meaningless. It would be appropriate to rewrite this entire section based on the information and analysis described in the Phase II Report.

Section 7.1.2.6: The "adaptive management" concept is poorly developed in this section, and only marginally improved in the Phase II Report. Insofar as adaptive management is considered "an essential part of every CALFED Program element", the EIS/EIR should describe the adaptive management techniques and programs considered for each element.

Section 7.1.2.7: This section discusses "new isolated facility intakes along the San Joaquin River." These intakes do not appear to be described in any iteration of Alternative 3. Such intakes would affect not only entrainment, but water quality and flow patterns in the southern Delta. Each component of the EIS/EIR should include an analysis of San Joaquin River intakes for Alternative 3.

Section 8.1: The EIS/EIR should analyze fully the benefits and impacts of agricultural land retirement in areas South of the Delta that contribute substantial quantities of poor quality return flow in the Bay-Delta. Such a program could have a positive impact on water supply, quality and reliability and should be considered in the program analysis.

Section 8.3: (1) The EIS/EIR fails to include any discussion of Shasta Lake recreation and the potential impacts to that facility under the no action analysis or the Program analysis. The EIS/EIR should include a discussion of the impacts of any reservoir reoperation that would occur as a result of increased diversions from the Delta, particularly those associated with an isolated facility. As noted above, the impact of visual changes in reservoir levels has a direct impact on recreation use of a facility. The EIS/EIR fails to analyze this impact or describe the extent to which it would occur. (2) The EIS/EIR should analyze the benefits to existing reservoir recreational opportunities associated with the development of new storage. New storage, both north and south of the Delta, could be used to minimize reservoir fluctuations in a given year. CALFED has the data to analyze this beneficial effect of new reservoirs, and should do so for each of the major reservoirs in the Sacramento River Region. (3) Mitigation strategies to avoid recreation impacts should include performance criteria that calls for maintaining reservoir levels as high as possible throughout the recreation season.

Section 8.6: This section concludes that each of the alternatives would have beneficial effects on recreation and water supply reliability, which would have a positive impact on regional economics. However, the analysis is based on a broad regional perspective that is not appropriate and does not provide an accurate evaluation. The analysis fails to account for impacts to areas within an identified sub-region. For example, negative impacts in one part of the Sacramento River Region would be unaffected by benefits that occur elsewhere in the region. However, the EIS/EIR might show the overall effect to be a positive impact. As discussed above, it would be more appropriate to compare impacts and benefits from a localized perspective. Would adverse impacts to Lake Shasta recreation be offset in such a way that Shasta County's economy is not adversely affected? This question is not evaluated in the EIS/EIR, but is of critical importance to the City of Redding and to Shasta County.

Section 8.6.2.6: (1) CALFED should reconsider the "minimum pools" in reservoirs from the perspective of recreation impacts and benefits. The EIS/EIR discusses maintaining "existing" minimum pools as a mitigation measure. The reality is that when the minimum pool is reached in a reservoir like Lake Shasta, the impacts to recreational uses are significant. The EIS/EIR should reevaluate the minimum pool levels and determine whether the existing minimum pool levels are appropriate. (2) The EIS/EIR should evaluate how often minimum pool levels are reached and whether that frequency is reduced or increased under the CALFED program. An additional mitigation measure should be prepared that commits the CALFED program to ensuring that the frequency is not increased under the Program.

Section 8.9: The EIS/EIR evaluates adverse visual impacts caused by proposed water storage projects. However, no analysis is given regarding impacts on existing reservoirs, such as Lake Shasta or Whiskeytown Reservoir. That analysis should be provided.

Section 9.2.3: The EIS/EIR notes that the Trinity River Restoration Program could result in reduced diversions to the Sacramento River. Did the analysis in the EIS/EIR account for these reduced diversions? The EIS/EIR should evaluate the impacts of these changed diversions on water supply availability and recreation, particularly in Whiskeytown Reservoir and Lake Shasta.

Section 12.1: CALFED meetings in the Red Bluff and Redding area, as well as elsewhere in the north state and in the Delta, have been exercises in frustration for those attending. Rather than feeling like participants in the process, attendees have said they feel like they are simply being told how the CALFED Program will proceed. Comments are generally accepted as CEQA comments and are recorded as such. This strategy does not result in an open dialogue with CALFED representatives and does not lead to the public's buy-in of CALFED's Program.

### **CITY OF REDDING COMMENTS ON THE PHASE II INTERIM REPORT**

#### **GENERAL COMMENT:**

The Phase II Report represents a substantial improvement over the main body of the EIS/EIR. However, it is not clear whether the Phase II Report is actually a part of the EIS/EIR. The Phase II Executive Summary refers to the report as being a "summary report of the Phase II process" that "includes references to sections in the Programmatic EIS/EIR". It would be most useful to the public if the EIS/EIR document incorporated the concepts set forth in the Phase II Report and reevaluated the various alternatives based on those concepts.

**Chapter 2:** (1) The discussion of "interrelationships" discusses the increased use of groundwater in export areas to assure a reliable supply. It should be made clear that conjunctive use of surface and groundwater supplies would be voluntary. Otherwise, CALFED's goal of not redirecting impacts would not be met. (2) The EIS/EIR should be reevaluated, applying the concepts described in this chapter, including system variability, time value of water, and adaptive management. The reevaluation should occur after these concepts are fully developed. It is not appropriate to select a preferred alternative when so much additional analysis remains to be done. (3) Regional concerns related to conjunctive use programs must consider and account for all costs related to groundwater extractions, including pumping and recharge. (4) The Phase II Report states that CALFED's analysis included an examination of program impacts on areas of origin. Where is that analysis presented? What were the assumptions that went into the analysis? What is CALFED's interpretation of the area of origin statutes? (5) On page 39, CALFED affirms its commitment to mitigating "impacts to Delta recreation resulting from CALFED activities." CALFED must be committed to assuring that its program will minimize impacts on recreation throughout the Bay-Delta system, including upstream areas, and mitigate for any impacts wherever those impacts occur. (6) On page 40, the document states that it is not CALFED policy to convert agricultural land to reduce water demands. Why isn't CALFED investigating that type of opportunity, especially in areas south of the Delta?

Some agricultural land retirement south of the Delta could provide substantial water supply, reliability and water quality benefits, and could minimize the overall costs of the CALFED program. The analysis should be included so the public can have a realistic understanding of the trade-offs that are being made.

**Chapter 3:** (1) This chapter includes an "Issues and Concerns" list for each of the program alternatives. The list sets out program-related issues that presumably were raised during the Phase II process. These issues and concerns should be fully discussed and analyzed in the EIS/EIR before a preferred alternative is selected. The selection of a preferred alternative will determine the outcome of the CALFED process. Without a more complete analysis at the programmatic stage that addresses the identified issues and concerns, it is not possible to select a viable preferred alternative. From the context of an adequate CEQA analysis, all of the "Issues and Concerns" must be fully evaluated in the EIS/EIR. (2) This chapter pays lip service to the "solution principles," stating that CALFED will provide "a qualitative measure of how well the alternatives meet the Program solution principles." However, neither the Phase II Report nor the EIS/EIR evaluates the alternatives in the context of the solution principles. In fact, and as noted above, the Phase II Report states that "a more thorough analysis and discussion must occur before the solution principles can be used to distinguish one alternative from another." Without an analysis that includes the solution principles, CALFED should not proceed with the selection of a preferred alternative. (3) The table on page 101 that compares the 1982 Peripheral Canal with CALFED Alternative 3 is misleading. First, while the Peripheral Canal had a capacity of 23,000 cfs, the plan was to release some of that water at various points in the Delta to improve in-Delta flows from east to west. Second, the third paragraph states that the isolated facility will improve water quality and reduce entrainment, but not increase export amounts. That is inconsistent with information in the EIS/EIR which anticipates full utilization of CVP and SWP export capacity, particularly during periods when the Delta pumps otherwise would be shut down but for the new intake points proposed on the Sacramento River.

**Chapter 4:** (1) Why is there no evaluation of potential fisheries impacts in the northern Delta for Alternative 3? It is inappropriate to simply conclude that "effects to northern Delta areas are unknown." The document should at least describe the range of impacts that could be caused in the northern Delta because of program implementation. (2) The Phase II Report, on page 125, indicates that locating a diversion on the Sacramento River will require additional Delta outflow to maintain flows in the Lower Sacramento River. The potential impacts associated with maintaining flows in the Lower Sacramento should be fully described, including impacts on fisheries and on upstream reservoir storage. (3) It is unclear how CALFED intends to work with interested parties and the public to "collectively determine the importance of each distinguishing characteristic in the overall evaluation of alternatives leading to selection of the preferred program alternative." The City's experience with CALFED's public meetings has consisted of either being told what CALFED is doing or of seeing comments received on the EIR/EIS without any response from CALFED representatives.

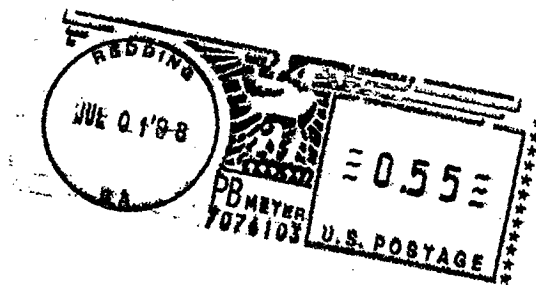
**Chapter 5:** (1) As stated above, CALFED must add to the list of issues to be resolved prior to selection of a preferred alternative an analysis of how the proposed alternatives fit

within the solution principles. (2) The question of bypass flows for an Alternative 3 diversion on the Sacramento River must be resolved and analyzed in an EIS/EIR before a preferred alternative can be selected. Such an analysis would help determine the true scope of project impacts and whether Alternative 3 is even feasible. (3) User charges should be focused on areas that benefit economically from the CALFED program. The EIS/EIR should analyze the cost savings associated with improving Delta water quality and providing greater supply reliability. That analysis would help determine who should bear the program costs. (4) The Financial Principles on page 153 should give some consideration to water rights priorities. It is unreasonable to hold early diverters responsible for the effects of diversions that began many years later. The CVP and SWP diversion facilities in the southern Delta have had a dramatic impact on in-Delta water quality and on the fisheries that make use of the Delta. The users of Delta export facilities should be required to pay from a majority of the program costs, since they will be the prime beneficiaries of the CALFED program. (5) Crediting based on payments made towards other parallel efforts to address Bay-Delta issues is not appropriate. Does this crediting include environmental charges that are imbedded into CVP water rates? The true impact of crediting is that it allows an entity to reduce its share of CALFED costs based on payments that otherwise may have been required, and it increases the financial impact on all the other parties paying for the CALFED program. (6) The EIS/EIR should include a financial feasibility component to analyze whether the alternatives proposed could be constructed. Whether an alternative is financially feasible and who will pay for that alternative are important issues that relate directly to the success of the CALFED program. Financial questions should be substantially resolved before a preferred alternative is selected.

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